



A. Science Energy Water

ATTACHMENT 1

COMMENTS TO THE CABRILLO PORT LIQUEFIED NATURAL GAS DEEPWATER PORT PROJECT DRAFT EISEIR

FEDERAL DOCKET # USCG 2004-16877
STATE CLEARINGHOUSE # 2004021107

Submitted Electronically to USCG and CSLC 12/17/2004

Page	Line No.	Subject	Statement	Correction	Comment
6-41	TerrBio-1	AMM TerrBio-1a: Erosion Control	<p>Applicant would comply with all permit requirements...California Clean Water Act Section 401 certification, and CDFG Section 1601 Streambed Alteration Agreement) for all water crossings or disturbances. To minimize sedimentation, implement the following measures during construction:</p> <ul style="list-style-type: none">• Clearing of vegetation shall be confined to the minimal area needed to conduct the construction activities.• Any work area near or adjacent to any stream, wetland or waterway shall be protected through installation of erosion-control fencing or other devices such as hay bales, matting or mulch;• Work near or in waters of the United States shall be conducted in a manner that minimizes turbidity, erosion, and other water quality impacts concerning regulatory agencies;• Any material that may be disturbed near or adjacent to streams or other waterways shall be contained to prevent any erosion into adjacent streams or waterways.• Construction equipment shall be stored and maintained at least 50 feet from streams or waterways.• At the completion of construction activities, disturbed soils would be stabilized and erosion-control fencing would remain until restoration activities	<p>Applicant: SoCalGas would comply with all permit requirements...California Clean Water Act Section 401 certification, and CDFG Section 16012 Streambed Alteration Agreement) for all water crossings or disturbances. To minimize sedimentation, implement the following measures during construction:</p> <ul style="list-style-type: none">• Clearing of vegetation shall be confined to the minimal area needed to conduct the construction activities. [REDAUNDANT WITH TerrBio-2b]• Any work area near or adjacent to any stream, wetland or waterway shall be protected through installation of erosion-control fencing or other devices such as hay bales, matting or mulch; [DELETE - REDUNDANT WITH HAZ-5B, WAT-7A, NPDES PERMIT REQUIREMENTS]• Work near or in waters of the United States shall be conducted in a manner that minimizes turbidity, erosion, and other water quality impacts concerning regulatory agencies; [DELETE - REDUNDANT WITH 401 CERT, SWPPP HAZ-5B, WAT-7A, NPDES PERMIT REQUIREMENTS]• Any material excavated soil or vegetation litterings that may be disturbed near or adjacent to streams or other waterways shall be contained to prevent any erosion into adjacent streams or waterways; [DELETE - REDUNDANT WITH SWPPP, HAZ-5B or WAT-7A EROSION CONTROL PLAN]	<p>1. SoCalGas is not the Applicant. 2. 1602 Streambed Alteration Agreement applies. 3. NPDES permit also applies and is not mentioned, and specifically applies to erosion and sedimentation issues, which appears to be the subject of this mitigation measure. 4. Re-Identify bullets to letters or numbers for easier reference and identification. 5. Bullet 1 is the only measure that truly addresses biological issues. Bullets 2-8 are redundant with water quality mitigation measures, and should be covered under SWPPP BMPs in Section 4.18. Bullets 2-8 could all be lumped under Bullet 8 as "BMPs" 6. Bullet 2: define "near" - that is a very ambiguous term and impossible to enforce during construction. 7. Bullet 5: The 50 feet buffer conflicts with MM TerrBio-1b, which has a 100 feet buffer and AMM TerrBio-2d, which specifies a 15 feet buffer for vegetation trimming (is that equivalent to "near" in Bullet 2, above?). It's quite clear that there is redundancy amongst mitigation measures and bulletted "sub-measures" that needs to be streamlined. Combined, these measures are infeasible to comply with during construction without consistency.</p>

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Section 4.8.4 contains revised information on this topic. The measures have been identified by the Applicant as part of the Project.



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G484-172 (cont'd)			ensure that soil is properly stabilized; • Best Management Practices (BMPs) shall be incorporated into the construction activities; and, • A Stormwater Pollution Prevention Plans (SWPPP) shall be implemented.	<ul style="list-style-type: none">Construction equipment shall be stored, refueled and maintained at least 50 feet from stream or waterways. [DELETE - CONFLICTS with MM Terrestrial buffer, should be covered in SWPPP in MM HAZ-5b or corrected WAT-7b]At the completion of construction activities, disturbed soils would be stabilized and erosion control facilities would remain until restoration activities ensure that soil is properly stabilized; [DELETE - REDUNDANT WITH WAT-7A]Best Management Practices (BMPs) shall be incorporated into the construction activities; and, [DELETE - TOO GENERIC TO IMPLEMENT; REDUNDANT WITH WAT-7A or HAZ-5B, or corrected WAT-7b to include SWPPP]A Stormwater Pollution Prevention Plans (SWPPP) shall be implemented. [DELETE - REDUNDANT WITH MM HAZ-5B (SWPPP), which should actually be a water quality requirement, not hazardous materials requirement]	<p>Please identify in all mitigation measures that reference the PIR the actual calculated PIR in feet and meters. (i.e. MM PS-7a, -7b). SoCalGas is not the applicant for the Cabrillo Port project.</p>
	Global	Potential Impact Radius (PIR)			
6-17	MM PS-7c	Implement Public Education/Awareness Program	In accordance with pipeline safety requirements contained in 49 CFR 192 Part O, the Applicant shall develop and implement a public awareness program that complies with API's recommended practice (RP) 1162, "Public Awareness Programs for	DELETE MEASURE or AMEND TO STATE: In accordance with pipeline safety requirements contained in 49 CFR 192 Part O, the Applicant SoCalGas shall develop and incorporate the proposed facilities into	SoCalGas operates in compliance with CPUC and DOT regulations. SoCalGas currently implements a RP

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The text has been revised.

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See the response to Comment G484-54.



A. J. Serrano Energy Inc.

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			<p>Pipeline Operators," including providing specific information to residents regarding ways to reduce their risks in the event of a fire or other release involving the pipeline and recommended ways to test and maintain household smoke detectors. Mitigation measures shall be implemented to ensure that residents receive early warning of a fire (e.g. install and instruct residents how to maintain smoke detectors), that they are provided information and assistance to plan escape routes, and that they can define how to account for other family members and neighbors to ensure that they have escaped. Additional information specific to residents living in manufactured housing can be obtained from the U.S. Fire Administration fact sheet, "Planning Emergency Escape from Manufactured Homes," which is available at http://fire.nist.gov/factsheets/escape.htm.</p>	<p>SoCalGas' existing "Implement-a public awareness program that complies with API's recommended practices (RP) 1162, "Public Awareness Programs for Pipeline Operators," including providing specific information to residents regarding ways to reduce their risks in the event of a fire or other release involving the pipeline and recommended ways to test and maintain household smoke detectors. Mitigation measures shall be implemented to ensure that residents receive early warning of a fire (e.g. install and instruct residents how to maintain smoke detectors), that they are provided information and assistance to plan escape routes, and that they can define how to account for other family members and neighbors to ensure that they have escaped. Additional information specific to residents living in manufactured housing can be obtained from the U.S. Fire Administration fact sheet, "Planning Emergency Escape from Manufactured Homes," which is available at http://fire.nist.gov/factsheets/escape.htm.</p>	<p>1162-compliant public awareness program as part of its daily operations system-wide.</p> <p>Based on the guidelines provided in RP 1162, Table 2-1 Summary, the following measures are appropriate for the "Affected Public" (residents located along transmission pipeline ROW and places of congregation):</p> <p>The "baseline message frequency" is once every 2 years.</p> <p>Baseline activity includes: targeted distribution of print materials and pipeline markers.</p> <p>Supplemental recommended activities include:</p> <ul style="list-style-type: none">• Print materials• Personal contact• Telephone calls• Group meetings• Open Houses <p>Recommended baseline messages include:</p> <ul style="list-style-type: none">• Pipeline purpose and reliability• Awareness of hazards and prevention measures undertaken• Damage Prevention Awareness• One-call Requirements• Leak Recognition and Response• Pipeline Location Information• How to get additional information• Availability of list of pipeline operators through NPMS <p>Per RP 1162, recommended supplemental messages include:</p> <ul style="list-style-type: none">• Information and/or overview of

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					<p>operator's Integrity Management Plan</p> <ul style="list-style-type: none">• ROW encroachment prevention• Any planned major maintenance/construction activity. <p>RP 1162 is a guideline and does not specify that the awareness program include installing and instructing residents on how to maintain smoke detectors. At a minimum, that specific example/requirement in the mitigation measure should be struck from the DEIS/EIR as it has no regulatory basis.</p> <p>When creating public education awareness mitigation measures for this project, please consider that SoCalGas is a utility that has provided safe and reliable natural gas transmission and distribution service to Southern California residents for over 100 years. SoCalGas already implements an extensive and active public awareness and outreach program, via personal communication through public scoping meetings for projects, in writing via bill payment inserts to customers, direct coordination with local officials and emergency response personnel and by participating in the One-Call program.</p> <p>Please also refer to SoCalGas' website (also translated in Spanish and Chinese), which covers much of the information required under RP 1162: http://www.socalgas.com/safety/ and reference this website in the DEIS/EIR.</p>

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6-42	MM TerrBio-1b	Spill Containment/Management Develop and Implement an SPOC Plan	<p>MM TerrBio-1b ... The Applicant has proposed the following measures to control and manage spills:</p> <ul style="list-style-type: none"> When working near waterways, the contractor shall have an emergency spill containment kit to contain and remove spilled fuels and hydraulic fluids. When feasible, equipment and vehicles shall be fueled and maintained in a designated Maintenance and Staging Area. Equipment refueling or storage of hazardous or petroleum materials shall not occur within 100 feet of waterways, beaches, streams or other waterways. If a 100-foot buffer is not feasible for a given refueling activity, secondary containment shall be employed during the fuel transfer and the transfer shall be continuously monitored to prevent accidental spills; If a designated area is not available, construction equipment shall be stored and maintained at least 100 feet from any jurisdictional stream channel, or as far away as available space allows in the right-of-way corridor. If this is not feasible at a particular crossing location because of space limitations or equipment breakdown, SoCalGas shall implement BMPs to ensure that the equipment, fuel, and spills do not enter the stream channel. Appropriate BMPs include safety fencing, secondary containment for fuel tanks and fuel transferers, drip pans, spill kits, and proper disposal of waste products. 	<p>MM TerrBio-1b ... The Applicant SoCalGas has prepared the shall implement the following measures to control and manage spills:</p> <ol style="list-style-type: none"> Implement a Spill Prevention, Containment and Countermeasure Plan that incorporates the following items: <ul style="list-style-type: none"> All equipment working within 100 feet of waterways will contain or have immediate access to a spill containment kit. All spills will be cleaned up immediately and associated contaminated soil removed and contained in an appropriate marked container prior to disposal off-site at an approved disposal facility. Construction equipment that leaks severely or persistently will be pulled from service and repaired immediately prior to resuming work. If refueling must occur within 100 feet of a waterbody, secondary containment must be employed during the fuel transfer and the transfer must be continuously monitored. When working near waterways, the contractor shall have an emergency spill containment kit to contain and remove spilled fuels and hydraulic fluids. When feasible, equipment and vehicles shall be fueled and maintained in a designated Maintenance and Staging Area. Equipment refueling or storage of hazardous or petroleum materials shall not occur within 100 feet of waterways. 	<ol style="list-style-type: none"> SoCalGas is not the applicant. This entire mitigation measure is an SPOC issue that should be addressed in HAZMAT (Sec. 4.12), not TerrBio. "Near" is too vague. Define a distance and make it consistent with TerrBio-1a (50 feet) or make TerrBio-1a consistent with TerrBio-1b. Equipment refueling must occur along the ROW as needed (Bullet #2). Bullet #3 is redundant with Bullet #2. Hazardous materials will not be stored near waterways; they will be stored centrally at the staging area in appropriate containment. Bullet #3 runs the gamut from refueling to erosion control and should be deleted. For erosion control references, please refer to MM WAT-7a, Sediment and Erosion Control Plan. Bullet #4 - This should be the purpose of the mitigation measure, as it encapsulates all of the SPOC-related requirements in bullets #1-3. Bullet #5 (Item #2 as proposed below) - Crude oil is not a material that will be used during construction of the onshore pipelines (equipment runs on diesel; hydraulic fluid is the primary lubricant). The mitigation measure is too vague; the original measure makes it sound like

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SPCC plans are existing legal requirements; therefore, the mitigation measure is not needed.



A "Sample Excerpt" only

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G484-175 (cont'd)			<ul style="list-style-type: none">A SPCC Plan shall be drafted to minimize potential impacts related to the construction fluids in the event of equipment failure or leakage, andAll contaminated soils and materials shall be excavated and removed from the site and disposed of appropriately to prevent sensitive animal species from becoming exposed to or killed by the effects of crude oil or other chemicals used during construction.	<p>beddies, streams or other waterways; if a 100-foot buffer is not feasible for a given refueling activity, secondary containment shall be employed during the fuel transfer and the transfer shall be continuously monitored to prevent accidental spills;</p> <ul style="list-style-type: none">If a designated area is not available, construction equipment shall be stored and maintained at least 100 feet from any jurisdictional stream channel, or as far away as available space allows in the right-of-way corridor. If this is not feasible at a particular crossing location because of space limitations or equipment breakdown, SoCalGas shall implement BMPs to ensure that the equipment, fuel, and spills do not enter the stream channel. Appropriate BMPs include safety fencing, secondary containment for fuel tanks and fuel transfers, drip pans, spill kits, and proper disposal of waste products. <ul style="list-style-type: none">A SPCC Plan shall be drafted to minimize potential impacts related to the construction fluids in the event of equipment failure or leakage; and <p>2. All excavated trench soils determined to be contaminated soils and materials shall be excavated and removed from the site and disposed of at an appropriately disposal facility to prevent sensitive animal species from becoming exposed to or killed by the effects of crude oil or other chemicals used during construction. SoCalGas is not responsible for remediating pre-</p>	<p>SoCalGas is responsible for cleaning up every contaminated site that may be encountered along the pipeline alignment. SoCalGas is only responsible for handling and management of trench spills.</p> <p>Again, SoCalGas recommends striking TerBio-1b, as it should be a HAZMAT mitigation measure, not biology mitigation measure. Furthermore, many of the sub-measures within TerBio-1b conflict with TerBio-1a and are redundant with Wat-7a and other water quality control requirements.</p> <p>Biology-specific mitigation measures should address biological issues directly.</p>



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48-37 48-38 6-44	9-40 1-10	Templo-2 Temporary or Permanent Impacts Regarding Construction, Operations, and Maintenance Effects on Rare and Special Status Plants	AMM-TerBlo-2a Pre-Construction Surveys • The Applicant would conduct pre-construction, in-season surveys according to appropriate survey protocols for special status species, and any federally-listed species specified by the USFWS or the CDFG. These surveys would occur before construction or maintenance activities are performed. Special status plant surveys would be performed in accordance with the USFWS, the CDFG and the California Native Plant Society (CNPS) standard survey protocols. • The surveys would be conducted at the appropriate time of year in order to identify the presence or absence of special status plant populations occurring within the Project area, and the results would be mapped for avoidance during construction and maintenance. If listed plants are identified in the construction areas, attempts would be made to salvage plants and replant following the completion of the construction activities. The USFWS and the CDFG would be contacted before any translocation planting activities. All salvaged Federal- and State-listed plants would be replanted following completion of the work activities. Sensitive resources near construction areas would be identified and clearly marked for avoidance. Taking of Federal- or State-listed species would be avoided or would be consistent with appropriate permits and approvals. Additional measures that would be	existing contamination that may be present at a given location along the alignment. AMM-TerBlo-2a Pre-Construction Surveys • The Applicant would conduct pre-construction, in-season surveys according to appropriate survey protocols for special status species, and any federally-listed species specified by the USFWS or the CDFG. These surveys would occur before construction or maintenance activities are performed. Special status plant surveys would be performed in accordance with the USFWS, the CDFG and the California Native Plant Society (CNPS) standard survey protocols. • The surveys would be conducted at the appropriate time of year in order to identify the presence or absence of special status plant populations occurring within the Project area. For special status plants identified on private lands, SoCalGas would provide 10-day pre-construction notification to CDFG to allow for plant salvage in accordance with the Native Plant Protection Act (Fish and Game Code Section 1913b), and the results would be mapped for avoidance during construction and maintenance. If listed plants are identified in the construction areas, attempts would be made to salvage plants and replant following the completion of the construction activities. The USFWS and the CDFG would be contacted before any translocation planting activities. All salvaged Federal- and State-listed plants would be replanted following completion of the work activities. Sensitive resources near construction areas would be identified and clearly marked for	1. SoCalGas is not the applicant. 2. Native Plant Protection Act requirements do not apply to public utilities. See, California Fish and Game Code Section 1913 (b). Though special status plant surveys may be conducted to identify special status plants within the proposed project footprint, SoCalGas must only notify CDFG 10-days prior to groundbreaking if any special status plants would be affected on private lands and CDFG may, at CDFG's discretion, choose to salvage identified plants. 3. Maintenance activities would be permitted separately under a programmatic biological opinion and/or 2081 incidental take authorization MOU/MA. 4. Define "rare" 5. Based on SoCalGas' prior experience and consultation with USFWS and CDFG on other projects, a 30-foot buffer is adequate for avoiding flagged/denied special-status or listed plant species outside of the project footprint. During the EEA, crew members will be educated to stay on the ROW and avoid flagged resources. 6. The final build requires clarification. Incidental take would be permitted by incidental take permits. Impacts would be minimized under said permits through prescribed mitigation measures. One would not re-

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Section 4.8.4 has been updated; however, the Applicant included the cited AM in the project description. As such, it must be implemented by the Applicant or the Applicant's designated representative.



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G484-176 (cont'd)			<p>undertaken include the following:</p> <ul style="list-style-type: none">• Determination of rare species' potential habitat would be conducted by a qualified biologist. Flagging, mapping, and fencing would be established to protect any special-status plant species within 200 feet (61m) of the ROW;• Any rare plant species within the 80-foot (24 m) ROW, work areas, access roads, and staging areas would be flagged, mapped on construction plans, and fenced to protect the area during construction;• An Environmental Monitor would supervise installation of construction fencing, and appropriate buffer distances would be determined. The Monitor would have the authority to require installation of silt fencing in highly sensitive areas or under certain conditions where potential erosion may impact a special status plant species or its habitat; and• If sensitive resources cannot be avoided, no work would be authorized until the appropriate resource agencies (CDFG, USFWS and NOAA Fisheries) determine that the action would not result in significant biological impacts.	<p>avoidance. Taking of Federal- or State-listed species would be avoided or would be consistent with appropriate permits and approvals.</p> <p>Additional measures that would be undertaken include the following:</p> <ul style="list-style-type: none">• Determination of rare species' potential suitable habitat would be conducted by a qualified biologist. Flagging, mapping, and fencing would be established to protect any special-status plant species within 200 30 feet (61-Xm) of the ROW;• Any rare [DEFINE] plant species within the 80-foot (24 m) ROW, work areas, access roads, and staging areas would be flagged, mapped on construction plans, and fenced to protect the area during construction; take would be permitted separately by obtaining the appropriate USFWS and CDFG permit(s) prior to commencing construction;• An Environmental Monitor would supervise installation of construction exclusionary fencing, and appropriate buffer distances would be determined. The Monitor would have the authority to require installation of silt fencing in highly sensitive areas or under certain conditions where potential erosion may impact a special status plant species or its habitat; and• If sensitive resources cannot be avoided, no work would be authorized until the appropriate resource agencies (CDFG, USFWS and NOAA Fisheries) determine that the action would not result in significant biological impacts. All work will be conducted in compliance with acquired incidental take permits (CDFG,	<p>consult with the agencies if a sensitive resource is encountered (presumably meaning listed species or species of concern). Under such conditions, one would operate in compliance with acquired permits - no additional consultation would be needed unless a previously unidentified listed species were encountered.</p>



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4.8-38 4.8-39 6-46	11-40 1-24	AMM TerriBio-2b Biological Resources Mitigation and Monitoring Plan (BRMIMP)	<p>AMM TerriBio-2b Biological Resources Mitigation and Monitoring Plan (BRMIMP) Surveys would be conducted within any areas potentially impacted by Project activities during construction or operation where special status species potentially occur. Surveys would be conducted... Results of the surveys would be used to develop a BRMIMP.</p> <p>The Applicant's proposed mitigation measures to address construction and maintenance effects on special status plant species include implementation of a BRMIMP. It would identify:</p> <p>All biological resources mitigation, monitoring and compliance conditions specified in any acquired permits for the Project;</p> <ul style="list-style-type: none">• All sensitive biological resources to be impacted, avoided, or mitigated by Project construction, operation and closure;• All required mitigation measures/avoidance strategies for each sensitive biological resource;• All locations, on a map of suitable scale, of laydown areas and areas requiring temporary protection and avoidance during construction;• Pre-and post-construction site photographs of all natural areas disturbed during Project construction activities;• Duration of biological monitoring and a description of monitoring methodologies and frequency;• Successful criteria for proposed mitigation;• Remedial measures to be implemented if	<p>USFWS, NOAA Fisheries).</p> <p>AMM TerriBio-1b Biological Resources Mitigation and Monitoring Plan (BRMIMP) Surveys, as required in TerriBio-2a, would be conducted within any areas potentially impacted by Project activities during construction or operation where habitat suitable for special status species potentially occur has been identified. Surveys would be conducted... (REDUNDANT with TerriBio-2a) Results of the surveys performed as required in TerriBio-2a would be used to develop a BRMIMP.</p> <p>The Applicant's SoCalGas shall prepare and implement proposed mitigation measures to address construction and maintenance effects on special status plant species include implementation of a BRMIMP that would include the following components: It would identify:</p> <ul style="list-style-type: none">• All biological resources mitigation, monitoring and compliance conditions specified in any acquired permits for the Project;• All sensitive biological resources to be impacted, avoided, or mitigated by Project construction, operation and closure;• All required mitigation measures/avoidance strategies for each sensitive biological resource;• All locations, on a map of suitable scale, of laydown areas and areas requiring temporary protection and avoidance during construction;• Pre-and post-construction site photographs of all natural areas disturbed during Project construction activities;• Duration of biological monitoring and a	<ol style="list-style-type: none">1. SoCalGas is not the applicant.2. The majority of this measure is redundant with the survey requirements specified in TerriBio-2a, bullet #1.3. Native Plant Protection Act requirements do not apply to public utilities. See, California Fish and Game Code Section 1913 (b). Though special-status plant surveys may be conducted to identify special-status plants within the proposed project footprint, SoCalGas must only notify CDFG 10-days prior to groundbreaking if any special-status plants would be affected on private lands and CDFG may, at CDFG's discretion, choose to salvage identified plants.4. Bullet #2 - The purpose of the DEISEIR is to quantify the resources that would be impacted by the project. Consequently a summary of impacts in the BRMIMP is unnecessary. Furthermore, impacts anticipated during operation and maintenance would be permitted separately from the construction project.5. Bullet #10 - SoCalGas would treat all sensitive areas equally. The purpose of restrictions on activities in coastal areas relative to other sensitive areas (interpreted to mean suitable habitat for listed species) seems irrelevant.6. Bullet #12, SoCalGas strives to avoid and/or minimize impacts to natural areas and sensitive

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G484-177 (cont'd)			<p>success criteria are not met; and</p> <ul style="list-style-type: none">A discussion of biological resource-related facility closure measures. <p>The Applicant's measures for the BRMIMP would include the following:</p> <ul style="list-style-type: none">Measures to avoid sensitive wildlife and plant species and habitats during pipeline construction, operations, and maintenance including restrictions in sensitive coastal areas, mapping and avoidance of sensitive resources;Restoration of sensitive vegetation types (coastal and riparian) potentially impacted during pipeline installation or repair, in accordance with other relevant mitigation measures;Inclusion of measures in the Operation and Maintenance Plan to avoid and minimize impacts on special status wildlife, plant species, bird-nesting areas, and sensitive vegetation types, such as riparian areas during routine operation or maintenance activities.Creation of a map of the pipeline route depicting the location of all special status plant species, wildlife species, important nesting areas, and wetlands to be used during necessary vehicular travel, for pedestrian use, or during equipment placement, to avoid these resources.Prohibition of disturbance to and clearing of coastal, riparian, and wetland vegetation during inspections. Travel and work areas shall be flagged and fenced before repair work to identify and avoid impacts on sensitive habitats as depicted on the pipeline map; andMaintenance of records of mitigation implementation on file at the pipeline maintenance office.	<p>description of monitoring methodologies and frequency;</p> <ul style="list-style-type: none">Successful criteria for proposed mitigation; Proposed success criteria for revegetation and restoration (where required);Remedial measures to be implemented if revegetation success criteria are not met; andA discussion of biological resource-related facility closure measures. When closure is proposed a biological resource mitigation plan will be developed in consultation with appropriate agencies, if warranted. It is impossible to predict the future level of land use change and development that may occur within presently natural areas along the pipeline alignment in 40-50 years time. <p>The Applicant's measures for the BRMIMP would include the following:</p> <ul style="list-style-type: none">Measures to avoid sensitive wildlife and plant species and habitats during pipeline construction, operations, and maintenance including restrictions in sensitive coastal areas, mapping and avoidance of sensitive resources;Restoration of sensitive vegetation types (coastal and riparian) potentially directly impacted during pipeline installation or repair, in accordance with other relevant mitigation measures;Inclusion of measures in the Operation and Maintenance Plan to avoid and minimize impacts on special status wildlife, plant species, bird-nesting areas, and sensitive vegetation types, such as riparian areas during routine operation or maintenance activities.Creation of a map of the pipeline route depicting the location of all special status plant species, wildlife species, important nesting areas, and wetlands to be used during necessary vehicular travel, for pedestrian use, or during equipment placement, to avoid these resources.Prohibition of disturbance to and clearing of coastal, riparian, and wetland vegetation during inspections. Travel and work areas shall be flagged and fenced before repair work to identify and avoid impacts on sensitive habitats as depicted on the pipeline map; andMaintenance of records of mitigation implementation on file at the pipeline maintenance office.	<p>habitats whenever feasible during routine operations and maintenance activities. Impacts, if unavoidable, are permitted individually for each O&M project through the appropriate resource agencies. SoCalGas employees and contractors are trained through SoCalGas' existing environmental education program and project-specific mitigate training program at each project site.</p> <p>7. Bullet #15 - Because of the complexity of SoCalGas' service territory and operations, SoCalGas does not have one single pipeline maintenance office. Each Region Field Environmental Specialist, District Biologist and/or Environmental Services representative is responsible for tracking and maintaining project records in his/her respective geographic territory. SoCalGas also maintains a centralized electronic database of projects requiring environmental permits and mitigation.</p>

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4.8-39 4.8-40 6-48	25-41 1-13	AMM TerrBio-2c Employee Environmental Awareness Program	AMM TerrBio-2c, Employee Environmental Awareness Program	<p>nesting areas, and wetlands to be used during necessary vehicular travel for pedestrian use or during equipment placement to avoid these resources. [NOT FEASIBLE - assumes vehicle travel, equipment placement and pedestrian traffic cause disturbance to special-status species and/or suitable habitat.]</p> <ul style="list-style-type: none"> Prohibition of disturbance to and clearing of coastal riparian, and wetland vegetation during inspections. Travel and work areas shall be flagged and fenced before repair work to identify and avoid impacts on sensitive habitats as depicted on the pipeline map; and Maintenance activities will be conducted in accordance with acquired permits. Impacts will be minimized to the greatest extent practicable in accordance with acquired permits. Maintenance of records of mitigation implementation on file at the pipeline maintenance office. SoCalGas will maintain records of completed maintenance projects, associated permits and mitigation implemented. 	<p>Add the following components to the EEAP Program:</p> <ol style="list-style-type: none"> 1. Remain on Designated Access Roads and ROWs 2. What to Do if Unanticipated Human Remains or Cultural Resources are Encountered 3. Designated Speed Limits 4. Clean Up Trash 5. No Pests/Firearms on Site 6. Known Sensitive Areas 7. Spill Response 8. Purpose of Biological, Cultural, Environmental Monitors

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See response to comment G484-176.



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Page	Line No.	Subject	Statement	Correction	Comment
4.8-40 6-49	14-42	AMM TerriBio-2d Biological Monitoring	AMM TerriBio-2d, Biological Monitoring The Applicant would use a qualified Biological Monitor to conduct and supervise the EEAP program and to conduct on-site biological monitoring.... ... The Biological Monitor would ensure that State and/or Federal wetland protection guidelines are followed, and that an adequate setback of at least 15 feet (4.5 m) (or other distance mandated by the CDFG or the USFWS) is observed at wetland and/or riparian (woody vegetation) edges that provide suitable habitat for special status species.	AMM TerriBio-2d, Biological Monitoring The Applicant-SoCalGas would use a qualified Biological Monitor to conduct and supervise the EEAP program and to conduct on-site biological monitoring in biologically sensitive areas (e.g. suitable listed species habitat, waterbodies, agricultural areas).... ... The Biological Monitor would ensure that State and/or Federal wetland protection guidelines are followed, and that an adequate setback of at least 15 feet (4.5 m) (or other distance mandated by the CDFG or the USFWS) is observed at wetland and/or riparian (woody vegetation) edges that provide suitable habitat for special status species. DELETE MEASURE. Redundant with TerriBio-2a and TerriBio-2d or remove redundant components and simplify measure to simply state: "Construction Activity shall be confined to the identified ROW and access roads."	9. Fire Control 10. Corrective Action Process 1. SoCalGas is not the applicant. 2. The 15-foot setback is not defined anywhere in federal or state wetland, waterbody or NPDES regulations (1602, 401, 402, 404) nor the Federal Endangered Species Act or California Endangered Species Act. Please clarify that any setback requirement would be determined in consultation with agencies on site-specific crossings during the permit acquisition process.
4.8-41 6-50 6-51	1-25	AMM TerriBio-2a Confine Activity to Identified Right-of-Way (ROW)		SoCalGas is not the applicant. All work would be conducted in accordance with acquired incidental take permits. There is no regulatory basis for avoiding 'special habitat features'. Please clarify. It is infeasible to limit stockpiling, storage of spoils or equipment to "previously disturbed" portions of the ROW. The ROW is an active workstrip and is explicitly designed and oriented to facilitate safe construction, passage of equipment and vehicles, trenching and soil stockpiling. Amend TerriBio-2c EEAP to include "Discussion of Limiting Construction to the Designated ROW".	

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The document states that the setback distance used could be mandated by the CDFG or the USFWS. This AM was provided by the Applicant.

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The AMs are part of the Project proposed by the Applicant.



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4.8-42 6-52	14-23	AMM TerrBio-3a Seed Bark Retention		DELETE MEASURE. Redundant with AGR-2A, Topsoil Segregation.	Flagging and avoidance of resources within 30 feet of the construction ROW was already proposed in TerrBio-2a. TerrBio- 2d already ensures flagged resources would be monitored and avoided. Clearing of vegetation would be required within the entire construction ROW as needed for equipment access, safety purposes and prevention of fire hazards. It is infeasible to selectively clear portions of the ROW. Topsoil segregation will preserve the native seedbank in natural areas as it will preserve soil productivity in agricultural areas. Two separate mitigation measures are not necessary for the same process.
4.8-42 6-52	26-39	MM TerrBio-3b Tree Avoidance and Replacement	The Applicant shall, to the extent possible, avoid, minimize, and compensate for impacts on trees by implementing the following: Replanting of tree rows impacted by construction activities on a 1:1 replacement ratio. The type of tree planted would be approved by CDFG. Replanting of tree rows impacted by construction activities on a 1:1 replacement ratio, or in accordance with local ordinances. The type of tree planted on private lands would be like- kind approved by CDFG. Trees removed in publicly jurisdictional areas, such as riparian stream corridors, would be replaced in accordance with acquired permits.	The Applicant SoCalGas shall, to the extent possible, avoid, minimize, and compensate for impacts on trees by implementing the following: • Replanting of tree rows impacted by construction activities on a 1:1 replacement ratio, or in accordance with local ordinances. The type of tree planted on private lands would be like- kind approved by CDFG. Trees removed in publicly jurisdictional areas, such as riparian stream corridors, would be replaced in accordance with acquired permits. • Replanting of tree rows impacted by construction activities on a 1:1 replacement ratio, or in accordance with local ordinances. The type of tree planted on private lands would be like- kind approved by CDFG. Trees removed in publicly jurisdictional areas, such as riparian stream corridors, would be replaced in accordance with acquired permits.	1. SoCalGas is not the applicant for this project. 2. Comment to Bullet 2 (shown at left): CDFG should not dictate what type of tree to replace on private lands, consequently, SoCalGas proposes to replace the tree like-kind or in accordance with the landowner's request, should any trees be impacted. Large trees, however, cannot be replanted directly over the permanent pipeline easement due to the potential for tree roots to grow around and constrict the pipeline. Where CDFG does have jurisdiction, such as riparian corridors within jurisdictional streambeds, like-kind

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Section 4.8.4 has been revised.

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Section 4.8.4 has been updated and clarified. See MM TerrBio-2g.



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Page	Line No.	Subject	Statement	Correction	Comment
4.8-43 6-53 6-54	MM TerrBlo-3c	Riparian Avoidance and Restoration	<p>The Applicant shall avoid, minimize, and compensate for impacts on riparian habitat during construction due to trenching, open cut crossings of waters of the United States and HDD pit excavation by:</p> <ul style="list-style-type: none">Avoiding potential impacts on riparian forest by clearly identifying and marking important areas, boring under waters of the United States where feasible, and identifying any proposed riparian habitat removal (and subsequent restoration) locations;Consulting with the CDFG for any unavoidable impacts on riparian vegetation, and fencing riparian vegetation adjacent to work areas to prevent impacts;Preparing and implementing riparian restoration, including replanting and monitoring elements. This includes supervision and verification of implementation of these measures by an approved Environmental Monitor;Before construction, identifying methods to restore the beds and banks of waters of the United States to pre-construction conditions including appropriate replacement ratios (in accordance with issued permit conditions or, at a	<p>The Applicant-SoCalGas shall avoid, minimize, and/or compensate for direct impacts on riparian habitat incurred during onshore pipeline construction due to trenching, open cut crossings of waters of the United States and HDD pit excavation by:</p> <ul style="list-style-type: none">Avoiding potential impacts on-to riparian forest by flagging or clearly identifying and marking in the field riparian habitat adjacent to the proposed construction ROW to be avoided-impacted areas; boring under waters of the United States where feasible; andIdentifying any proposed riparian habitat removal locations, including: acreage of anticipated riparian habitat impact specific to each crossing, composition of impacted habitat and number of native trees and shrubs to be removed at each crossing, (and subsequent restoration) in appropriate 1602 (CDFG) and 404 (USACOF) permit applications;Training contractor crews as part of the Employee Environmental Awareness Program (MM TerrBlo-2c) regarding the locations of riparian habitat to be avoided and the specific locations permitted for removal.Consulting with the CDFG for any unavoidable impacts on riparian	<p>replacement of native trees would make the most sense biologically and appropriate mitigation, such as replacement ratios, or in-lieu payment to a conservation bank would be negotiated as part of the 1602 and/or 404 permitting process with the agencies.</p> <p>1. SoCalGas is not the applicant.</p> <p>2. This mitigation measure contains elements that should be part of a separate measure focused explicitly on a Revegetation and Restoration Plan. Bullet #5 in Particular should be a separate Revegetation and Restoration Plan mitigation measure.</p> <p>3. CSLC should not prescribe mitigation ratios without consulting with the appropriate agencies regarding the project-specific impacts. Also the measures should clarify that in-lieu payment to a conservation or mitigation bank may be paid rather than restoring the site. The requirement for in-lieu fees vs. site restoration would be determined in accordance with the appropriate resource agency during the permitting phase of the project. Consequently, like-kind replacement and in-lieu payment should not both be required, as it would be redundant compensation for a single impact.</p>

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SoCalGas is the Applicant's designated representative. The mitigation measures are considered appropriate and necessary.

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			<p>minimum, a 3:1 replacement ratio of habitat acreage and a replacement ratio of at least 1:1 for the number of trees and shrubs present before construction); and</p> <ul style="list-style-type: none"> Identifying restoration methods, including native tree and shrub species matching pre-construction conditions, understory native seed mix composition and application methods; planting methodology, description of monitoring efforts to measure replacement success, and success criteria and contingency measures for off-site habitat creation in case mitigation measures are unsuccessful. 	<p>vegetation, and fencing riparian vegetation adjacent to work areas to prevent impacts; [REDUNDANT WITH BULLET 2 ABOVE]</p> <ul style="list-style-type: none"> Preparing and implementing riparian restoration a project-specific Revegetation and Restoration Plan for riparian and natural areas impacted during pipeline construction, including: <ul style="list-style-type: none"> replanting proposed plant pallet and seed mixes, replacement ratios, installation or application methodology revegetation success criteria and corrective action measures in the event success criteria are not met monitoring elements—This includes supervision and verification of implementation of and reporting on the implementation, success and effectiveness of these measures by an approved Environmental-Monitor qualified biologist; Identifying methods to restore the beds and banks of waters of the United States and the State to pre-construction conditions Including appropriate replacement mitigation ratios (in accordance with issued permit conditions or, at a minimum, a 3:1 replacement mitigation ratio of for in-flow payment to acquire riparian habitat 	

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GEN ER AL				accreage at an existing conservation bank and/or on-site restoration including like-kind replacement ratio of at least a 1:1 ratio for the number of riparian trees and shrubs removed during present before construction); and Identifying restoration methods, including native tree and shrub species matching pre-construction conditions, understory native seed mix composition and application methods, planting methodology, description of monitoring efforts to measure replacement success, and success criteria and contingency measures for off-site habitat creation in case mitigation measures are unsuccessful.	
		Process to Request Additional Temporary Workspace During Construction (Variance Requests)			Should SoCalGas encounter a situation during construction where additional workspace is needed due to unforeseen circumstances, a process should be implemented whereby SoCalGas documents consultation with the appropriate resource agencies for the additional impacts if the additional workspace results in impacts to a regulated resource (e.g. cultural resource, riparian habitat, listed species, or listed species habitat). SoCalGas proposes the following measure: Should additional temporary workspace be required during active construction due to unforeseen circumstances, SoCalGas and the Biological and Cultural Monitors would perform clearance surveys of

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Section 2.7.1 contains information on temporary work space requirements.

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					the proposed workspace area prior to expanding the footprint to ensure no regulated resources (e.g. riparian habitat, listed species, or listed species habitat, cultural resources) would be affected. If regulated resources are present and unavoidable, and the workspace is necessary, SoCalGas would re-consult with appropriate resource agencies (CDFG, USFWS) to obtain approval for the additional workspace prior to mobilizing within said workspace area. SoCalGas would submit a Variance Request via email, or in hardcopy, to CSLC or USCG documenting resource agency approval of the additional impacts to regulated resources. During the project, or at the end of the project, SoCalGas would work with the agencies to amend the existing permits to account for the actual impacts to jurisdictional resources as a result of the workspace modifications, and pay any additional compensation costs, if applicable.
6-26	AES-2 AES-3 AES-4		Onshore Construction	Onshore-Offshore Construction	These three impacts apply to Offshore Construction, not Onshore construction as shown in the header above AES-2. Onshore construction impacts/measure begin on 6-27 with AES-5.
6-67	MM GEO-1c	Design and Monitoring (of HDD)		DELETE MEASURE, redundant with WAT-5a	Redundant with WAT-5a, Prepare and Implement HDD Contingency Plan. This design and the associated implementation would be included as part of the Contingency Plan.
6-78	LU-2a	Minimize Disruption for Residences in the Construction Area	AMM LU-2a Minimize Disruption for Residences in the Construction Area The Applicant would minimize disruption in	AMM LU-2a Minimize Disruption for Residences in the Construction Area The Applicant SoCalGas would minimize	1. SoCalGas is not the Applicant. 2. Construction time limits may vary based on local jurisdiction road

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The text has been revised.

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Mitigation measures in the October 2004 Draft EIS/EIR that concerned horizontal directional drilling have been deleted. The Project has been modified, and pipelines would be installed beneath the shore using horizontal directional boring (HDB) instead of horizontal directional drilling (HDD) technology because HDB uses lower drilling fluid pressure, which minimizes or eliminates the risk of fluids escaping into the surrounding formation or to the surface. The Drilling Fluid Release Monitoring Plan (Appendix D1) contains training and monitoring procedures to prevent releases of drilling fluid.

Mitigation Measure WAT-3a would minimize the potential for an accidental release of drilling fluids during construction at the shore crossing and is also cited as a mitigation measure under Impact GEO-1.

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See the response to Comment G484-3.



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			residential areas during construction by: Restrict construction activities to 7 A.M. to 7 P.M.	disruption in residential areas during construction by: Restrict construction activities to 7 A.M. to 7 P.M. or time restrictions specified in local road encroachment permits.	encroachment permits.
6-72	LU-2b	Reduce disruption for residences within 25 feet (7.6 m) of the construction work area	AMM LU-2b Reduce disruption for residences within 25 feet (7.6 m) of the construction work area The Applicant would further reduce disruption in residential areas during construction by: Limit the construction ROW to the existing permanent ROW, where feasible. Maintain a minimum of 25 feet (7.6 m) between the residence and the construction work area, where possible.	AMM LU-2b Reduce disruption for residences within 25 feet (7.6 m) of the construction work area The Applicant would further reduce disruption in residential areas during construction by: Limit the width of the construction ROW to 50 feet the existing permanent ROW when constructing in (non-franchise) residential areas, where feasible. Maintain a minimum of 25 feet (7.6 m) between the residence and the construction work area, where possible.	1. SoCalGas is not the Applicant. 2. Measure LU-2b conflicts with LU-2c regarding the residential buffer. SoCalGas may not be able to maintain the specified buffer distance. Areas where SoCalGas may encroach within 25 feet of a residence (assumed to mean the structure, not the associated lawn or grounds) during construction will be identified during the detailed engineering design and analysis. 3. Pipelines in franchise locations (public roads), do not have a permanent easement. Permanent easements apply to non-franchise positions on private and/or public lands. 4. A permanent ROW does not presently exist for the proposed pipelines. An easier way to state this, and to ensure compliance with this measure, is to set a preferred limit. SoCalGas proposes 50 feet, which is typical for a permanent easement. 5. To ensure worker safety in steep or highly variable topography, SoCalGas may need a wider temporary construction easement than measure LU-2b specifies. Areas where this conflict arises will be identified during detailed engineering design and analysis.

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See the response to Comment G484-3.



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6-73	LU-2c	Maintain minimum distance to residences	MM LU-2c: Maintain minimum distance to residences The Applicant shall further reduce disruption for residences by maintaining a minimum of 50 feet (15.2 m) between the residence and construction work area, where possible.	DELETE AS INFEASIBLE-MM-LU-2c Maintain minimum distance to residences The Applicant shall further reduce disruption for residences by maintaining a minimum of 50 feet (15.2 m) between the residence and construction work area, where possible.	Conflicts with LU-2b.
6-82	MM NOI-4o	Prohibit construction work near residences	MM NOI-4o: Prohibit construction work near residences		Please clarify definition of "near" as it applies to MM NOI-4o. Near is too vague.
6-82	MM NOI-4p	Limit heavy equipment activity near residences	MM NOI-4p: Limit heavy equipment activity near residences		Please clarify definition of "near" as it applies to MM NOI-4p. Near is too vague.
6-84	MM REC-4a	Parking and Access Plan	MM REC-4a: Parking and Access Plan Applicant shall ensure that all construction-related parking would be restricted to the Reliant site and would not restrict beach access parking.	MM REC-4a: Parking and Access Plan Applicant shall ensure that all construction-related parking would be restricted to the Reliant site or designated contractor yard staging areas and would not restrict beach access parking. MM REC-5a: Staging Area Contractor Yard Locations Staging areas would be located at least 1 mile (1.6 km) away from park and recreational areas.	
6-85	MM REC-5a	Staging Area Locations	MM REC-5a: Staging Area Locations Staging areas would be located at least 1 mile (1.6 km) away from park and recreational areas.		Equipment and material staging are integrated into the pipeline construction spread, so it is infeasible to locate staging areas at least one mile from certain park areas (i.e. equipment will be staged at the HDD shore crossing site, South Fork of Santa Clara River, etc.). Contractor yards, however, contain parking areas for crew vehicles, minor equipment fabrication areas, construction trailers, material staging, soil stockpiles etc. and SoCalGas will make every effort to situate the contractor yard at least one mile from the nearest park.
6-85	MM Socio-3a	Scheduling to avoid impacts to tourism	AMM Socio-3a: Scheduling to avoid impacts to tourism Construction would be scheduled through heavily traveled routes around special events, such as the Oxnard Strawberry		SoCalGas cannot plan construction to avoid every local cultural event, however, it would be helpful to SoCalGas if the DEIS/IEIR could provide supporting documentation

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The text has been revised.

G484-190

Section 4.14.4 has been updated and the cited mitigation measure has been deleted.

G484-191

This mitigation measure has been included to provide guidance to ensure adherence to local noise ordinances.

G484-192

The pertinent text has been revised.

G484-193

The pertinent text has been revised.

G484-194

The pertinent text has been revised.

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6-87	TRANS-1a	Traffic Control Plans	Festival in May or Six Flags Magic Mountain during peak summer months, to avoid impacts to tourism.		that correlates a decrease in tourism associated with onshore pipeline construction. SoCalGas does not believe there is a correlation. Whether they are local or tourists, drivers are adaptable and must deal frequently with road construction and spontaneous vehicle accidents each day. Consequently, a temporary construction disturbance resulting from utility construction should have no effect on local tourism. Per MM TRANS-1, traffic control plans will be implemented to minimize traffic disturbance and identify alternative routes/detours. SoCalGas will obtain road encroachment permits from local jurisdictions that will specify the daytime working hours (or nighttime, if necessary).
			MM Trans-1a Traffic Control Plans Two traffic control plans, prepared by a registered professional engineer in accordance with the Caltrans traffic manual shall be developed and implemented during construction: one for the Center Road Pipeline and on for the Line 225 Pipeline Loop....	MM Trans-1 Traffic Control Plans Two traffic control plans, prepared by a registered professional engineer in accordance with the Work Area Protection and Traffic Control Manual (1999) or, where working within Caltrans ROW, the Caltrans manual, shall be developed and implemented during construction: one for the Center Road Pipeline and on for the Line 225 Pipeline Loop....	The "WAPTC" Manual was developed by the California Joint Utility Traffic Control Committee and meets, and in some cases exceeds, the standards specified in Section 21400 of the California Vehicle Code. When working in Caltrans ROW, SoCalGas would implement measures required by Caltrans traffic manual.
6-88	TRANS-1b	Fund Inspection Position	MM Trans-1b Fund Inspection Position Applicant shall fund at least one full-time inspection position for each pipeline segment during the duration of construction plus one month to monitor compliance with the mitigation measures in this EIS/EIR, the approved Traffic Control Plan, and restoration; these workers will be selected	MM Trans-1b Fund Inspection Position Applicant shall fund at least one full-time inspection position for each pipeline segment during the duration of construction plus one month to monitor compliance with the mitigation measures in this EIS/EIR, the approved Traffic Control Plan, and restoration; these workers will be selected	SoCalGas negotiates inspection fees with each individual City or County during the road encroachment permit acquisition process. Typically, SoCalGas and the County or City estimate the total number of hours anticipated for inspection activities, and SoCalGas

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Section 4.17.4 has been updated; see MM TRANS-1a.

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The pertinent text has been revised.



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6-90	MM Trans-6a	Limit Construction Hours	and employed by Ventura County, or the City of Oxnard, or the City of Santa Clarita as agreed to by all parties.	and employed by Ventura County, or the City of Oxnard, or the City of Santa Clarita as agreed to by all parties. SoCalGas will negotiate individually with each city or county during the road encroachment permit application process regarding frequency and cost of city or county staff inspection services, and will compensate the city or county accordingly. SoCalGas' contractor will provide a designated traffic control coordinator to ensure compliance with the Traffic Control Plan. Road restoration will be completed in compliance with the local road encroachment permit requirements.	pays that fee at the time the road encroachment permit is issued. A city or county inspector then periodically inspects the project, but rarely, if ever, is assigned by the City or County to a SoCalGas project full time. Significant portions of each pipeline alignment are in non-road areas (agricultural or disturbed undeveloped/industrial), so there would be no need to have a road inspector when working in those areas. Furthermore, there is little to inspect full-time after construction is completed, so that requirement is unnecessary and impractical.
			To mitigate traffic impacts at the intersection, construction shall not occur during afternoon peak periods. In addition, the Applicant shall be required to provide compensatory mitigation fees to the Ventura County Department of Public Works to offset impacts to the Los Angeles Avenue (118) and Santa Clara Avenue intersection. Such fees shall be determined during the encroachment process with the County.	To mitigate traffic impacts at the intersection, construction shall occur in accordance with the starting and ending times identified in the local road encroachment permits not occur during afternoon peak periods. In addition, the Applicant shall be required to provide compensatory mitigation fees to the Ventura County Department of Public Works to offset impacts to the Los Angeles Avenue (118) and Santa Clara Avenue intersection. Such Any compensatory fees or construction work time restrictions shall be determined during the road encroachment permit process with the county or city.	1. SoCalGas is not the applicant. 2. The local jurisdiction will identify appropriate work hours as negotiated during the road encroachment permit acquisition process. 3. This mitigation measure is otherwise infeasible. 4. SoCalGas may conventionally bore the intersection to minimize impacts to traffic; the construction method will be determined during the detailed engineering design and analysis process and details will be negotiated with the County during the road encroachment permit acquisition process.
6-90	MM Trans 7a	Repair Damage to Roads	MM Trans-7a Repair Damage to Roads Any damage to roads that occurs as a result of the Project shall be repaired to original conditions within 21 days in accordance with local road encroachment permit conditions.	MM Trans-7a Repair Damage to Roads Any damage to roads that occurs as a result of the Project shall be repaired to original conditions within 21 days of completion of the road-based portion of each alignment or in accordance with local road encroachment permit conditions that SoCalGas will obtain prior to construction.	Restoring the road "within 21 days" (of what? - too vague) is infeasible given the linear nature of construction projects. Work shall proceed in accordance with the requirements specified in road encroachment permits SoCalGas will obtain for the project.

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The pertinent text has been revised.

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The text has been revised.



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6-90	MM Trans 7b	Hauling Permits	MM Trans-7b Hauling Permits All appropriate County/City and CalTrans hauling permits would be up to date prior to the start of construction to avoid damage to roadways. While there may be some temporary impacts to roads during construction, any such damage would be repaired to the original conditions within 21 days..	MM Trans-7b Hauling Permits All appropriate County/City and CalTrans hauling permits would be up to date prior to the start of construction to avoid damage to roadways. While there may be some temporary impacts to roads during construction, any such damage would be repaired to the original conditions within 21 days..	The second statement is redundant with Trans 7a, above. Refer to proposed re-wording for Trans-7a.
4.19-15	3-6	Impact E.J-1, Disproportionate Impact on Minority and Low-Income Community of a Pipeline Accident	In preparing this EIS/EIR, it was determined that straightforward application of the regulatory definition for identifying these HCAs would not adequately address the potential risk for people living in manufactured homes, mobile homes, or in travel trailers used for temporary or semi-permanent housing near the pipeline.		<p>The CPUC and DOT have exclusive jurisdiction over public utility and natural gas pipeline safety issues. Consequently, the CSLC and USCG have no jurisdiction over these issues.</p> <p>As a public utility, SoCalGas operates and maintains its extensive pipeline system in accordance with CPUC and DOT regulations regardless of demographic and socioeconomic characteristics of the surrounding areas.</p> <p>In addition, the entire pipeline project will be constructed to meet Class 3 Design Criteria. Consequently, the probability of a pipeline failure is no greater in minority communities than at other locations along the proposed alignment. Therefore, there is no disproportionate adverse effect on a minority community.</p> <p>CPUC General Order 112e and 49 CFR Part 192 subpart O do not require pipeline operators to consider the quality of construction of individual private residences when identifying HCAs.</p>

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The text has been revised.

G484-200

See response to Comment G484-165.